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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-00-

UNITED STATES OF AMERICA, )  
Plaintiff, ) Case No.: 2:14-cr-00178-JAD-GWF  
)  
vs. ) STIPULATION TO CONTINUE MOTION  
) DEADLINES AND HEARING  
) (8th request)  
)  
IAN PINCOMBE, )  
)  
Defendants. )

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Allison L. Herr, Special Assistant United States Attorney, counsel for the United States of America and Jennifer Waldo, Esq., counsel for defendant Ian Pincombe, that time for the filing of the Defendant Reply shall be extended to September 11, 2015, and hearing currently scheduled for August 31, 2015 at 1:30 pm be continued for a period of 30 days.

This Stipulation is entered into for the following reasons:

1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the hearing. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research and negotiate language for the same.

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1       2. The additional time requested is not sought for the purposes of delay, but to  
2 allow counsel sufficient time to complete negotiations.

3       3. The parties agree to the continuance.

4       4. The defendant is in custody and does not object to a short continuance.

5       5. Denial of this request could result in a miscarriage of justice. The additional  
6 time requested by this Stipulation is excludable in computing the time within which the trial  
7 herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code  
8 §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and  
9 § 3161(h)(7)(B)(iv).

10       6. This is the eighth request to continue the hearing.

11       DATED this 28th day of August, 2015.

12 DANIEL G. BOGDEN  
United States Attorney

JENNIFER WALDO  
Attorney for Defendant

14 By: /s/ Allison Herr  
15 ALLISON L. HERR  
16 Special Assistant United States Attorney

By: /s/ Jennifer Waldo  
JENNIFER WALDO

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the hearing. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research and negotiate language for the same.

2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete negotiations.

3. The parties agree to the continuance.

4. The defendant is in custody and does not object to a short continuance.

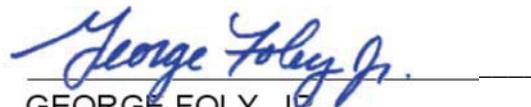
5. Denial of this request could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and § 3161(h)(7)(B)(iv).

6. This is the eighth request to continue the hearing.

1 THEREFORE, IT IS HEREBY ORDERED that the deadline for the filing of the  
2 Defendant's Reply shall be extended to September 11, 2015;

3 IT IS FURTHER ORDERED that hearing currently scheduled for August 31, 2015 at  
4 1:30 pm is vacated and continued for a period of 30 days to  
5 Monday, October 5, 2015 at 1:30 p.m.

6 DATED this 28th day of August, 2015.

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9 GEORGE FOLY, JR.  
United States Magistrate Judge